

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

JAMES and PHYLLIS SHAFFER,)	
)	
Plaintiffs,)	Case No. 4:18-cv-00601-NKL
)	
v.)	
)	SHAREHOLDER DERIVATIVE
)	COMPLAINT
HEALTH ACQUISITION COMPANY LLC,)	
et al.)	
)	
Defendants)	(Jury Trial Demanded)
)	
and)	
)	
HMC/CAH CONSOLIDATED, INC.)	
A Delaware corporation,)	
)	
Nominal Defendant)	

**PLAINTIFFS' MOTION FOR EXTENSION OF DATES IN SCHEDULING
ORDER AND FOR RELEASE OF THE US BANK RECORDS**

Plaintiffs move the court for an extension of the discovery schedule as to dates for 1) discovery motions, 2) disclosure and depositions of expert witnesses, and 3) completion of discovery. Plaintiffs request a three-month extension of each such date. The ground for this motion is that it is literally impossible for Plaintiffs to meet the current schedule in light of the fact they have received essentially no discovery to date notwithstanding that the case is now almost four months past the Rule 26f meeting. Given the amount of discovery to be done, Plaintiffs believe that a three-month extension is necessary.

Plaintiffs also request release to them of the U.S. Bank records. Those records are essential to Plaintiffs' case and it is apparent Plaintiffs cannot obtain them from Defendants.

Counsel for Defendants has advised counsel for Plaintiffs that he has no objection to the extension of the scheduling order requested in this motion. Counsel for Defendants has been asked several times for his position on the US Bank records and in Defendants' memorandum filed today it is apparent Defendants continue to object to release of those records.

This motion is supported by the accompanying suggestions.

Respectfully submitted,

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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2019, the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF system with a copy to thereby be furnished to all counsel of record.

/s/ C. Brooks Wood
Attorney for Plaintiffs